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Brief
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Application Serial No. GROUP 260

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Filing Date:

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Title:

Controller

Inventor:

Salcudean, T.

Art Unit:

2609

Examiner:

Chang, V.

My File:

UBC53US

9541357

The Commissioner of Patents
and Trademarks
Washington, D.C. 20231

Dear Sirs: **Brief in Response to the Examiner's Answer**

1. Applicant is not certain whether the Examiner's Answer raises new issues or not. The arguments presented are convolute, but if understood in a nut shell are based on the following;

Clark discloses a platform with two degrees of freedom thus platforms with two degrees of freedom are known.

Cadoz on the other hand states that 1) he can apply tactile feed back in a two degree of freedom joystick and 2) Cadoz uses magnetic coils to do so.

The extrapolation from the above disclosure of Clare and statements of Cadoz made by the Brief that it is therefore obvious to apply tactile feedback to a platform having two degrees of freedom, it is respectfully submitted, is unreasonable. Applicant might find this statement reasonable if it further stated that the same or equivalent means to those taught by Cadoz to generate tactile feedback on a two degree of freedom joystick where simply applied in an obvious manner to the platform of Clark. However, the Appeal brief seems to make much more sweeping statements and implies that any combination of magnetic feedback and a two degree of freedom platform is

obvious from statements 1 and 2 above of Cadoz and the Clark platform which has two degrees of freedom. The Examiner's Answer uses this broad interpretation of how the prior art may be applied as a reason to completely ignore the significant differences in structure defined in Applicant's claims and as pointed out in the Appeal Brief. It is not believed that this broad reasoning should be applied.

If the prior art is read fairly based on the rules for combining references and for what it fairly discloses, it is believed the objections to this application will not be applied. Any reasonable reconstruction based solely on the prior art will not, it is submitted, produce the present invention.

With the prior art before him, but without the disclosure of present application, one would not know that the problem solved by Applicant existed and certainly the simple and elegant solution invented and claimed by Applicant would not be apparent.

The function and purposes of the components of the invention found in the prior art and the problems solved by them are not the same as the invention under consideration and therefore the combination should not have been made. If the examiner contends that facts not in evidence should be considered in determining patentability, it is submitted this is not reasonable, if the examiner contends that something is well known in the art it is submitted that that something should be made of record so Applicant may deal with the facts not what appears simply as statements in the Examiner's Answer.

The law requires that the prior art suggest the desirability of making the invention see *Ryko Manufacturing Co. vs. Nu-Star Inc* 21 USPQ 2d at 1057 or *Interconned Planning Corp. vs. Feil* 774 F 2d. 1132,1143: 227 USPQ 543, 557 Fed. circuit. 1985. The desirability of the present invention cannot be found in the references cited..

2. Furthermore the specific structures taught by applicant for limiting tactile feedback to two mutually perpendicular directions using pairs of magnetic means (magnets) mounted in fixed relationship on a base and a pair of magnetic force generating means (coils) mounted in fixed relationship on the platform is found in either Cadoz or Clark. Cadoz does not teach mounting two magnets in fixed relationship to a base and two coils in fixed relationship on a platform nor is it obvious from the teaching of Cadoz to do so. There is no teaching what so ever of mounting the magnets and coils in a specific manner to provide two degrees of freedom with tactile feedback,

nor is the arrangement of Applicant obvious based on Cadoz.

3. The statement on page 6 lines line 16 to 19

"it is obvious that the device of Clark modified by Cadoz has to make the projected area of the magnetic field constant so that a *constant magnetic force* can be generated which provides *constant tactile feedback* to the operators" (emphasis added)

is a teaching that cannot be found anywhere in the cited references nor is it obvious from the references. Even armed with the knowledge of the present invention and an honest effort to try to understand Applicant was unsuccessful in understanding what is being attempting to be said. It is not clear to Applicant what the "constant force" is intended to do. Applicant has designed a system that produces a force vs. current relationship that is INDEPENDENT of platform position.

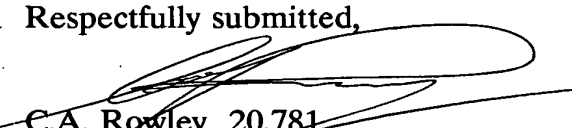
The statement on page 6 lines 19 to 21 of the Examiner's Answer

"it is a well known practise to provide users constant feedback in designing input device with tactile feedback"

(repeated with the same clarity on page 5 line 8) also is not understood. What is the basis for this statement, this ^{is} a practise that is not understood by Applicant and certainly is not a well known practise. Evidence that this is a well known practise would be appreciated, such evidence might also help Applicant to understand the statement.

It is believed that the present invention teaches and claims a significant advance in the art and that this application is in condition for allowance and such action is respectfully requested.

Respectfully submitted,


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